

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN KARGHER LLP
14 15260 Ventura Blvd., Suite 715
15 Sherman Oaks, California 91403
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 CHICAGO TITLE INSURANCE COMPANY; FIDELITY
20 NATIONAL TITLE GROUP, INC.; and TICOR TITLE OF
21 NEVADA, INC.

22 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
23 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

24 Janet Trost, Esq.
25 501 S. Rancho Drive
26 Suite H-56
27 Las Vegas, Nevada 89106

28 **UNITED STATES DISTRICT COURT**

DISTRICT OF NEVADA

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE
COMPANY et al.,

Defendants.

Case No.: 3:20-CV-00046-MMD-WGC

**STIPULATION AND ORDER
CONTINUING DEADLINES TO
RESPOND (ECF NOS. 82, 83, 84, AND
91)**

FIRST REQUEST

COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”), Fidelity National Title Group, Inc., (“FNTG”) and Tigor Title of Nevada, Inc. (“Tigor Agency”) (collectively, “Defendants”) and plaintiff Bank of America, N.A. (“BANA”), by and through their respective attorneys of record, hereby agree and stipulate as follows:

1 1. On March 6, 2023, Chicago Title, FNTG, and Ticor Agency each filed their
2 respective motions to dismiss BANA's complaint. (ECF Nos. 82, 83, and 84);

3 2. On April 3, 2023, BANA filed its responses to Chicago Title, FNTG, and Ticor
4 Agency's motions to dismiss (ECF Nos. 89, 90, and 92) and filed a countermotion for partial
5 summary judgment in response to Chicago Title's motion to dismiss (ECF No. 91);

6 3. The deadline for Defendants to reply in support of their respective motions to
7 dismiss is currently April 10, 2023, while the deadline for Chicago Title to oppose the motion for
8 partial summary judgment is currently April 24, 2023

9 4. Chicago Title, FNTG, and Ticor Agency request a thirty (30) day extension of their
10 respective deadlines to reply in support of their motions and a sixteen (16) day extension of
11 Chicago Title's deadline to oppose BANA's countermotion for partial summary judgment, such
12 all responses shall be due on Wednesday, May 10, 2023, to afford Defendants additional time to
13 respond to the legal arguments set forth in BANA's responses and countermotion;

14 5. BANA does not oppose the requested extensions;

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

6. This is the first request for an extension which is made in good faith and not for purposes of delay;

IT IS SO STIPULATED that Chicago Title, FNTG, and Ticor Agency's deadline to reply in support of their motions to dismiss and Chicago Title's deadline to oppose BANA's countermotion for partial summary judgment are hereby extended through and including May 10, 2023.

Dated: April 5, 2023

SINCLAIR BRAUN KARGHER LLP

By: /s/-Kevin S. Sinclair
KEVIN S. SINCLAIR
Attorneys for Defendants
CHICAGO TITLE INSURANCE COMPANY;
FIDELITY NATIONAL TITLE GROUP, INC.;
and TICOR TITLE AGENCY OF NEVADA,
INC.

Dated: April 5, 2023

WRIGHT FINLAY & ZAK, LLP

By: /s/-Lindsay D. Dragon
LINDSAY D. DRAGON
Attorneys for Plaintiff
BANK OF AMERICA, N.A.

IT IS SO ORDERED.

Dated this 5th day of April, 2023



MIRANDA M. DU
UNITED STATES DISTRICT JUDGE